

Nantahala-Pisgah Forest Partnership Consensus Agreements and Comments on the Forest Plan Revision

We, the undersigned members of the Nantahala-Pisgah Forest Partnership submit these comments on the Forest Plan revision for Nantahala-Pisgah National Forest. Our members include a diversity of stakeholders with representatives from many interest groups including cultural heritage, recreation, economic development, conservation, water, wildlife, forest products, and the Eastern Band of Cherokee Indians. All of these interests have a deep connection with Nantahala-Pisgah National Forest and we provide these comments based on the belief that mutual support, commitment, and on-going collaboration offer the best opportunity to collectively fulfill our goals and contribute to a positive future for the Forest.

Economic Development & Tourism

- Permitting for special uses should consider economic impacts of special use applications.
- The Forest Service should actively seek cooperation and help from local governments and other organizations, including qualified volunteers, for the upkeep of recreational infrastructure before permanently downgrading or closing facilities and trails.
- The Forest should actively pursue public-private partnerships for the maintenance and upgrade of recreational facilities and trails.
- Consistent with standards guiding the location of structures and infrastructure, fire towers and existing rights-of-way should be made available as telecommunications infrastructure for rural communities lacking access to broadband. Any retrofitting of existing sites or structures should include provisions to protect aesthetic quality and should not preclude public access to fire towers where it currently is allowed.

Cultural Heritage

- Broaden Forest interpretation, designation, and stewardship to include the full cultural diversity and history of the region.
- We encourage partnerships between the EBCI, NCDCCR, NCWRC and FS on protection and interpretation of cultural sites and landmarks, land management, and wildlife restoration.

- We encourage growth and sustainable harvest of materials for local arts and crafts, such as white oak, hickory, and river cane, for local crafters and especially enrolled tribal members.
- We support Forest Plan provisions for the EBCI to create income flow from cultural site management activities through permitting or other mechanisms.
- We support implementation of Tribal Forest Protection Act through community engagement, consultation on culturally sensitive areas, timber marking and harvesting, and workforce development.
- We support efforts to identify, protect, manage and interpret cultural sites such as Cherokee trails, archeological sites, and other resources eligible for protection under the National Historical Preservation Act.
- We support utilization of the Cherokee syllabary in the interpretation of Cherokee sites and signage for local land marks.

Recreation.

- The Forest Service should coordinate and invest in volunteer efforts and educational skills needed to build and maintain sustainable trail systems.
- The plan revision should provide support and guidance to advance opportunities to create and enhance trail loops for hikers, bicyclists, equestrians and mineral collectors and to provide and ensure a diversity of experiences for all skill levels of trail users while maintaining or improving wildlife habitat conditions.
- The plan revision should include provisions ensuring hydroelectric impoundments provide flows suitable for aquatic organisms' health and recreational uses.
- Trails causing resource damage should only be closed or user groups excluded after all options for maintenance, re-alignment, and partnering with outside organizations have been exhausted.
- We recommend that Bent Creek Experimental Forest's mission be expanded to include research on recreation and trail management and their interaction with other forest resources.
- Fees generated by recreational assets (camping, etc.) should be used to support and maintain those assets.

Forest Products

- Strategies for improving efficiency in timber sale planning, analysis, and implementation should be sought. We suggest planning sales in areas of high consensus for management, which would decrease environmental analysis needs and costs. On the implementation side, work with partner organizations as much as needed to increase the performance of the Forest.
- When timber sales are offered, the cost of the harvest method should be taken into account when determining the minimum bid. For example, skyline harvest is more expensive than ground-based harvest.
- Timber harvest should be sensitive to trails and other recreation infrastructure, sensitive view-sheds, water quality and rare species. Projects should impact access to recreational areas only in situations of public safety. When applicable, interpret and educate public to the benefits of timber management for wildlife and forest health.
- Specific goals and plans should be developed for managing and sustaining traditional/ medicinal plants such as ginseng, bloodroot and golden seal.
- We believe a stocking program, using local genotypes and funded by herb harvesting permits, is needed to maintain harvestable populations.

Wildlife

- Invasive exotic plants threaten many natural communities and efforts should be made to control them where they are present and prevent their colonization where they are not, especially in riparian areas.
- We encourage the identification of areas likely and suitable for elk colonization over the life of the new Forest Plan.
- We support the replacement of all artificial fish passage barriers, including culverts, with structures that allow aquatic organisms to migrate unimpeded.

Water

- We believe managing for high quality water is one of the most important missions of Nantahala-Pisgah National Forest.
- Streams and streamside areas are critically important not only for water quality, but for both terrestrial and aquatic wildlife. The width of streamside

management areas (SMA) associated with forestry activities should be a minimum of 35-50 feet, depending of the type of stream or water body. Perennial trout streams and public water supplies should have a minimum SMA of 50 feet on each side of the water body. Wider SMAs should be used as upland slope increases. In areas with slopes of 25% or greater along perennial trout waters or public water supplies, the minimum SMA width should be 100 feet on each side of the stream. Trails and stream crossings should continue to be allowed within SMAs, using appropriate practices to preserve bank stability and adequate canopy and protect water quality.

- Streams classified by the State of North Carolina as Outstanding Resource Waters (ORWs) should be mapped in the Forest Plan and referenced during project development. Lands draining into these waters should (at minimum) be managed according to the "Quality Standards of ORW" found in section (c) of the North Carolina administrative code: 15A NCAC 02B .0225..
- Geological maps of acid-bearing rock formations should be mapped in the Forest Plan. [The NC State Geologist has these formations mapped and could provide the information if needed.]The plan should also require project managers to seek to avoid disturbance of acid-bearing rocks in a project area, if at all possible. If complete avoidance is not possible, projects should seek to minimize exposure and disturbance of acid-bearing formations. [A December 14, 2007 Memorandum issued by the North Carolina Division of Water Quality entitled *Assessing and Controlling Acid Rock Drainage on Projects Requiring Section 401 Water Quality Certification* contains recommendations for reducing acid drainage from disturbed formations. This guidance is not intended to *prevent* the negative effects of acid runoff, but should help *reduce* the effects in areas where disturbance is unavoidable.]
- To maintain and improve water quality, it is necessary to increase maintenance of best management practices to reduce sedimentation from existing Forest Service roads and trails. Where funds are inadequate for trail maintenance, seek assistance from local government, private, and non-profit sources.
- Roads and trails that are not maintained to standards necessary to protect water quality should be evaluated for rehabilitation and/or closure. Trails causing resource damage should only be closed or user groups excluded after all options, including partnerships with outside organizations, have been exhausted. A comprehensive transportation plan that insures a sustainable road network and includes a public input component should be developed for the Nantahala and Pisgah National Forests.
- The Forest Plan should prioritize Aquatic Organism Passage as the preferred method of culvert installation and replacement. Culverts carrying native and

trout streams should be removed or replaced with structures that allow aquatic organism passage.

- Extirpated native aquatic species should be re-introduced where opportunities exist.
- An inventory of aquatic obstructions should be conducted for all waterways on National Forest lands. American Rivers has developed a barrier prioritization tool that allows for strategic selection of barriers that pose the greatest ecological, social, and/or economic threats to waterways. The Forest Service is encouraged to use this tool collaboratively to improve collective knowledge of aquatic obstructions.
- Flash flood warning signs are needed on streams popular for fishing in backcountry locations.
- The Forest Plan should clearly delineate public water supply intakes downstream of Forest lands and should advise project managers to consult with state and local water supply managers and users when appropriate.

Conservation.

- Prescribed fire should be targeted at the highest priority eco-zones: shortleaf pine, pine-oak/heath, dry oak, and dry-mesic oak forests and woodlands with a range of 12,000-25,000 acres of prescribed fire annually.
- We support compatible management of the 36 areas submitted to the Forest Service by the North Carolina Natural Heritage Program (Map in Progress)
- We support policies requiring no surface occupancy for oil and gas development and exploration. Furthermore, the Forest Plan should prohibit commercial surface mining of hard rock and minerals but make allowances for recreational rock-hounding.
- The Forest Plan Revision should evaluate the threat posed by invasive pests and pathogens, such as Asian longhorn beetle and sudden oak death, and begin the planning process for preventing and responding to potential outbreaks.